

FILED - KZ

February 19, 2025 9:44 AM

U.S. DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
ems Scanned by ES/2/19

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

HERMAN L POUNDS,  
Plaintiff,

**1:25-cv-187**

Paul L. Maloney  
U.S. District Judge

v.

Case No: \_\_\_\_\_

CHARTER TOWNSHIP OF KALAMAZOO,  
KALAMAZOO TOWNSHIP POLICE DEPARTMENT,  
CHIEF OF POLICE Bryan N. Ergang,  
OFFICER Alexander Westphal (Badge # 192),  
OFFICER [Tanner Callahan 2] (Badge # \_\_\_\_\_),  
OFFICER [SGT Thompson 3] (Badge # \_\_\_\_\_),  
COUNTY OF KALAMAZOO,  
KALAMAZOO COUNTY SHERIFF'S DEPARTMENT,  
SHERIFF [Richard Fuller],  
JAIL ADMINISTRATOR [NAME],  
BOOKING OFFICER [NAME] (Badge # \_\_\_\_\_),  
JAIL STAFF [NAMES],  
[TOWING COMPANY Grahams Towing and Recovery],  
[TOWING COMPANY OWNER James Grahams],  
Defendants.

\_\_\_\_\_/

CIVIL RIGHTS COMPLAINT AND DEMAND FOR JURY TRIAL  
42 U.S.C. § 1983

NOW COMES Plaintiff, Herman Pounds, in propria persona, and I declare that the Defendants named above systematically Trustpassed against me And violated my civil rights and personal property:

#### JURISDICTION AND VENUE

1. This action arises under 42 U.S.C. § 1983, 18 U.S.C. §§ 1961-1968 (RICO), the Fourth, Fifth, and Fourteenth Amendments to the United States Constitution.
2. This Court has jurisdiction according to 28 U.S.C. §§ 1331 and 1343.
3. Venue is proper under 28 U.S.C. § 1391(b) as all events occurred in this district.

## **PARTIES**

4. The plaintiff is a foreign national recognized by the U.S. Department of State who resides in Kalamazoo, Michigan, and travels with a valid U.S. Passport as identification.

5. Federal authorities document and recognize the Plaintiff's status as a foreign national.

6. Plaintiff's rights are protected under:

- Vienna Convention on Consular Relations
- U.S. State Department protocols
- Federal law regarding foreign nationals
- International treaties
- Diplomatic relations provisions

[Continue with all other parties...]

## **STATEMENT OF FACTS**

7. On February 5, 2025, at approximately 12:52 PM:

- Officers activated emergency lights without emergency circumstances
- Violation of MCL 257.603
- No exigent circumstances existed
- Multiple officer responses without cause

8. During Stop:

- Valid U.S. Passport presented
- Federal ID rejected
- Claimed warrant never produced
- No Miranda rights given
- Notice of Inquiry refused
- Report of Detention refused

9. Unlawful Detention:

- Taken directly to jail
- No magistrate presentation
- Forced fingerprinting
- Unauthorized booking
- Property seized
- Rights violated

[Continue with all counts and specific violations...]

## **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff requests:

- A. Compensatory damages exceeding \$75,000
- B. Punitive damages against individual defendants
- C. Treble damages under RICO
- D. Declaratory and injunctive relief:  
[List all specific relief requested]
- E. Attorney fees under 42 U.S.C. § 1988
- F. Costs and interest
- G. Such other relief as justice requires

JURY DEMAND

The plaintiff demands trial by jury on all issues so triable.

Respectfully submitted,

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Herman Pounds  
[2108 Sunnyside APT C- 19]  
[Kalamazoo Michigan]  
[Phone (269) 873-2167]

Dated: [February 19, 2024]

VERIFICATION

I declare under penalty of perjury that the foregoing is true and correct.

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Herman Pounds

Dated: [February 19, 2025]

2/19/25  
Herman Pounds VCC 1-308  
2108 Sunnyside APT C-19  
Kalamazoo Michigan [49048]